

**ORIGINAL**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
at Baltimore**

**FEE PAID**

**FEE NOT PAID  
(SEND LETTER)**

In re:

\*

FRANK'S NURSERY  
& CRAFTS, INC., et al.,

\*

Case No. 01-52415-JS

\*

Debtors.

\*

\* \* \* \* \*

**MOTION FOR ADMISSION OF  
JOHN S. WILLEMS PRO HAC VICE**

Pursuant to Local Bankruptcy Rule 9010-3(b) of this court, and

Local Rule 101.1(b) of the United States District Court for the District of

Maryland, Gregory A. Cross, Esquire, a member of the bar of this Court,

respectfully moves the admission of John S. Willems, Esquire, to appear pro

hac vice in the above-captioned proceeding as counsel for The Chase

Manhattan Bank and the lender group that is listed on Attachment A hereto

(the "Lender Group").

Mr. Cross and Mr. Willems respectfully certify as follows:

1. Mr. Willems is not a member of the Bar of Maryland.
2. Mr. Willems is a member of the bar of the State of New

York and has been admitted to practice before the United States District  
Courts for the Southern, Eastern and Western Districts of New York. Mr.  
Willems is a member in good standing in all courts in which he has been  
admitted.

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3. During the twelve (12) months immediately preceding the filing of this motion, Mr. Willems has not been admitted pro hac vice in this Court.

4. Mr. Willems has never been disbarred, suspended, or denied admission to practice.

5. Mr. Willems is familiar with the Federal Bankruptcy Rules, the Local Bankruptcy Rules, the Federal Rules of Evidence, and the Maryland Lawyers' Rules of Professional Conduct, and understands that he shall be subject to disciplinary jurisdiction of this Court.

6. Co-counsel for the proposed admittee in this proceeding will be the undersigned or Heather Deans Foley, Esquire, who have been formally admitted to the Bar of the United States District Court for the District of Maryland.

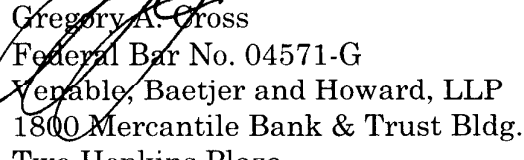
7. It is understood that admission pro hac vice does not constitute formal admission to the United States District Court for the District of Maryland.

**WHEREFORE**, Gregory A. Cross respectfully requests that this Court enter an Order admitting John S. Willems pro hac vice to appear

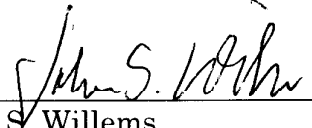
before this Court in the above-captioned case on behalf of The Chase  
Manhattan Bank and the Lender Group.

Respectfully submitted,

MOVANT:

  
\_\_\_\_\_  
Gregory A. Gross  
Federal Bar No. 04571-G  
Venable, Baetjer and Howard, LLP  
1800 Mercantile Bank & Trust Bldg.  
Two Hopkins Plaza  
Baltimore, Maryland 21201  
(410) 244-7725 (telephone)  
(410) 244-7742 (fax)

PROPOSED ADMITTEE:

  
\_\_\_\_\_  
John S. Willems  
White & Case LLP  
1155 Avenue of The Americas  
New York, New York 10036  
(212) 819-8200 (telephone)  
(212) 354-8113 (fax)

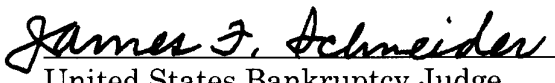
**ORDER**

Motion \_\_\_\_ GRANTED.

Motion ☒ GRANTED subject to payment of \$50.00 filing fee to Clerk of Court.

Motion \_\_\_\_ DENIED.

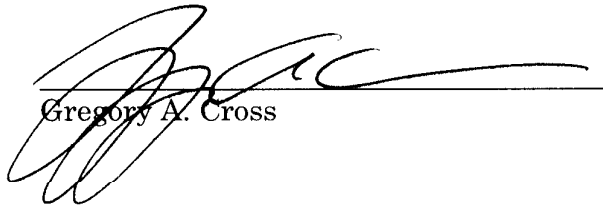
February 20, 2001  
Dated

  
\_\_\_\_\_  
United States Bankruptcy Judge  
for the District of Maryland

**ENTERED**  
FEB 20 2001  
CLERK'S OFFICE  
U.S. BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
BALTIMORE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of February, 2001, a copy of the foregoing Motion for Admission of John S. Willems Pro Hac Vice, was delivered by hand to: Paul M. Nussbaum and Martin T. Fletcher, Seven Saint Paul Street, Suite 1400, Baltimore, Maryland 21202, counsel for the Debtor and the Office of the United States Trustee, Karen H. Moore, Assistant Trustee, 300 West Pratt Street, Suite 350, Baltimore, Maryland 21201.

  
\_\_\_\_\_  
Gregory A. Cross

## **ATTACHMENT A**

1. First Source Financial LLP
2. Fremont Investment & Loan
3. Goldman Sachs Credit Partners LP
4. IBJ Whitehall Bank & Trust Co.
5. Jackson National Life Insurance Co.
6. Highland Capital
7. Transamerica Business Credit Corp.